

Application No. 10/626,875  
Amd. dated December 8, 2006

Docket No. D/A3053-311291

Reply to September 8, 2006 and November 21, 2006 Communications

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REMARKS

Claims 1-88 are pending. Claims 1, 20, 30, 39, 49, 58, 77 and 81-84 are amended for clarifications purposes without prejudice or disclaimer. No new matter is added. Reconsideration in view of the following remarks is respectfully requested.

The Communication objects to paragraph 0129 of the specification as drawn to the future. Applicants respectfully request withdrawal of the objection to paragraph 0129 in light of the amendment to the specification. No new matter has been added by these amendments.

The Communication provisionally rejects claims 1, 20, 39, 58, and 81-84 on the grounds of non-statutory obviousness-type double patenting over claims 1, 16 and 31-32 of co-pending Application No. 10/626,856.

Applicants thank Examiner Ponikiewski for directing attention to the provisional double patenting rejection and note that once a patent issues with the asserted scope, Applicants will reevaluate the relevancy of the terminal disclaimer requirement, revise the claim scope of the pending application or take other appropriate action.

Assistant Examiner Tomasz Ponikiewski and Primary Examiner Neveen Abel-Jalil agreed during the June 28, 2006 personal interview with Applicants' representative that "[t]he Examiners agreed that the response filed on 6/8/06 overcomes the objects and rejections under 35 USC 101, 112 second paragraph." (See for example, lines 4-5 of the Interview Summary paper number 20060628, filed by Examiner Neveen Abel-Jalil and Assistant Examiner Tomasz Ponikiewski and mailed on July 6, 2006. The agreement was also referenced in the Interview Summary filed by Applicants' representative on July 10, 2006.

Applicants representative received no indication that Examiner Ponikiewski intended to depart from the agreement enunciated in the

Application No. 10/626,875                      Docket No. D/A3053-311291  
Amd. dated December 8, 2006  
Reply to September 8, 2006 and November 21, 2006 Communications

interview summaries until Applicants' receipt of the September 8, 2006 Communication. The Communication re-asserts the 35 USC 101 rejections previously withdrawn by Primary Examiner Abel-Jalil and asserts that the rejections enumerated in the September 8, 2006 Communication are now final. Applicants' respectfully submit that the final rejection is improper in light of the withdrawal of these rejections by Assistant Examiner Ponikiewski and Primary Examiner Neveen Abel-Jalil as clearly recorded in the Examiner's Interview Summary and Applicants Interview Summary.

The Communication rejects claims 1, 20, 39, 58, 77 and 81-84 under 35 U.S.C. § 101. This rejection is respectfully traversed.

Applicants note that claim 1 recites storing the interesting similarity vectors in a memory. Moreover, at least one predictive model is also determined and stored in a memory. Claim 39 recites storing the inter-story similarity vectors in a memory for the story-pairs of the source-identified training stories and determining at least one predictive model in the memory for link detection. Claims 58, and 81-84 recite similar structure.

Claim 77 similarly recites determining and storing the at least one source specific transformation actions for the determined transformation errors in a memory and identifying and transforming transformation errors in other transformed source-identified texts based on the source specific transformation actions in the memory. Thus, claims 1, 20, 39, 58, 77 and 81-74 define statutory subject matter. Applicants therefore request the withdrawal of the 35 U.S.C. § 101 rejection of claims 1, 20, 39, 58, 77 and 81-74.

Application No. 10/626,875  
Amd. dated December 8, 2006

Docket No. D/A3053-311291

Reply to September 8, 2006 and November 21, 2006 Communications

The Communication rejects claims 1-5, 9-10, 14-24, 28-29, 33-43, 47-48, 52-62, 66-67, 71-76 and 81-84 under 35 U.S.C. § 102(e). This rejection is respectfully traversed.

The updated rejection of September 8, 2006 asserts that the “the claim language nor the arguments do not support or realize distinction Sundaresan and claimed invention. Thus, it is broadly interpreted by the examiner on the cited reference.” See for example, September 8, 2006 Communication, lines 7-10.

In particular, the detailed action asserts that “determining inter-story similarity vectors for at least one story-pair (column 4, lines 23-24, wherein ‘similarity vectors’ mean similar terms’.” (See September 8, 2006 Communication, p. 25, lines 15-16.)

Applicants respectfully submit that this portion of Sundaresan merely refers to step 5 of the classifier algorithm and notes that “for classification of semi-structured documents, the class is chosen that has the most similar terms distribution to the term distribution of the test documents. The terms distribution is the distribution of the augmented terms.” See for example, Sundaresan, col. 4, lines 23-24. As discussed at for example, pp. 15-19 of Applicants’ June 8, 2006 Amendment, this portion of Sundaresan refers to the comparison of a test document to a specified class.

At for example, col. 10, lines 26-33, Sundaresan describes how “from the vectors of all training documents, 352 in a class the sum is calculated. The sum vector is then normalized by the number of documents 352. The process is repeated until a statistical model 200 exists for each class of documents 352. It is upon these statistical models 200 that classes 400 are assigned to documents 354 of previously undetermined classes.”

Application No. 10/626,875  
Amd. dated December 8, 2006

Docket No. D/A3053-311291

Reply to September 8, 2006 and November 21, 2006 Communications

Thus, Sundaresan's comparison of test documents to classes fails to disclose, teach or even suggest at least the features directed to: 1) determining inter-story similarity vectors in a memory for at least one story-pair of the source-identified training stories, as recited in independent claim 1 and similarly recited in independent claims 20, and 81-82; and 2) determining inter-story similarity vectors in a memory for the story-pairs of the source-identified stories, as recited in independent claim 39 and similarly recited in independent claims 58, and 83-84. There is simply no indication at the indicated portions or elsewhere in Sundaresan of at least these features. These claimed features which define patentable subject matter over Sundaresan were also discussed during the July 6, 2006 Personal Interview. Story-pairs are further discussed in the specification at for example, paragraph 11 and paragraph 12, lines 18-19 of the specification.

Thus, claims 1, 20, 39, 58 and 81-84 define patentable subject matter over Sundaresan. Claims 2-19, 21-38, 40-57, 59-76 and 85-88 depend from claims 1, 20, 39, 58 and 81-84 and therefore define patentable subject matter for at least the same reasons.

In regard to dependent claims 2, 21, 40 and 59, Sundaresan describes "combining all the documents of a given type together in a meaningful fashion. In, particular, the modeling sub-module 415 combines the individual vectors in the class by adding them together and normalizing the result." See for example, Sundaresan col. 10, lines 16-21. There is simply no disclosure, here or elsewhere in Sundaresan of at least the claimed features directed to: 3) determining at least one source pair statistics for at least one story-pair, as recited in dependent claims 2, 21, 40 and 59. Thus, claims 2, 21, 40 and 59 define patentable subject matter over the art of record.

Application No. 10/626,875  
Amd. dated December 8, 2006

Docket No. D/A3053-311291

Reply to September 8, 2006 and November 21, 2006 Communications

The Communication rejects claims 9-10 based on Sundaresan, col. 1, lines 63 – col. 2, line 43. However, these portions of Sundaresan merely describe problems with many document classification systems but fail to disclose, teach or even suggest at least the features directed to: 4) transforming the source identified stories, as recited in dependent claim 9; or 5) wherein transforming the source-identified training stories is at least one of translating, transcribing and linguistically transforming, as recited in dependent claim 10.

Instead, the Communication, asserts that “wherein the HTML and XML are in English, therefore translation will not be necessary”. (See Communication, at for example, p. 7, lines 3-4) Applicants understand this to mean that the cited portions of Sundaresan do not disclose translation from English. Applicants agree. Moreover, Sundaresan, at for example, col. 2, line 43 states that “Examples include documents in HTML and XML and, thus represent a large fraction of the documents on the web.” However, there is simply no disclosure, teaching or even suggestion of at least the features directed to: 4) transforming the source identified stories, as recited in dependent claim 9; or 5) wherein transforming the source-identified training stories is at least one of translating, transcribing and linguistically transforming, as recited in dependent claim 10. Thus, at least claims 9 and 10 define patentable subject matter over the art of record.

The Communication rejects claims 77-80 under 35 U.S.C. § 102(a) over Brown. This rejection is respectfully traversed.

As previously asserted, Brown does not disclose, teach or even suggest at least the features directed to: 6) determining a verified first source-mode transformation of the source-identified training corpus text from a first source mode to a second source mode; 7) determining an un-

Application No. 10/626,875  
Amd. dated December 8, 2006

Docket No. D/A3053-311291

Reply to September 8, 2006 and November 21, 2006 Communications

verified second source-mode transformation of the source-identified training corpus text from a first source mode to a second source mode; 8) determining at least one transformation errors associated with distribution differences between the first and second transformations and identified sources; 9) determining and storing at least one source-specific transformation actions for the determined transformation errors in a memory; and 10) identifying and transforming transformation errors in other transformed source-identified texts based on the source-specific transformation actions in the memory, as recited in independent claim 77.

The Communication asserts at p. 21, lines 10-11, that the 'transformation' of feature 6 would be the 'single-pass incremental clustering method'. However, Applicants note that the Communication fails to afford patentable weight to each of the words recited in the claims. In particular, the Communication affords no patentable weight to at least the terms "first source mode" and "second source mode". Transformations from a first source mode such as speech, to a second source mode such as recognized speech text, are discussed at, for example paragraph 86, lines 11-14 of the specification. Thus, claim 77 as originally presented and as currently amended merely for clarification purposes, defines patentable subject matter over the art of record.

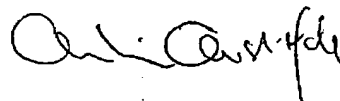
The updated comments in the September 8, 2006 Communication assert that it is unclear what the first transformation is. Paragraph 86 of the specification provides additional examples of transformations as do claims 78-80. Claims 77-80 therefore define patentable subject matter over the art of record. Applicants therefore respectfully request the withdrawal of the 35 U.S.C. § 102(a) rejection of claims 77-80.

Application No. 10/626,875 Docket No. D/A3053-311291  
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Reply to September 8, 2006 and November 21, 2006 Communications

The Communication combines Sundaresan with Gange to reject claims 6-8, 25-27, 44-46 and 63-65 and combines Sundaresan with Zhou to reject claim 11-13, 30-32, 49-51 and 68-70. However, Applicants remarks from the prior response re-iterated during the personal interview are herein incorporated by reference and re-iterated, neither Gange nor Zhou remedy the above-described deficiencies of Sundaresan. Thus, Applicants respectfully request the withdrawal of the rejection of claims 6-8, 25-27, 44-46 and 63-65 and claims 11-13, 30-32, 49-51 and 68-70 under 35 U.S.C. § 103(a).

Applicants' respectfully submit this application is in condition for allowance. Favorable consideration and prompt allowance are earnestly solicited. However, should the Examiner believe anything further is desirable in order to place this application in even better condition for allowance; the Examiner is invited to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,



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Date: December 8, 2006

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